

EXHIBIT D

Maruska, Amy

From: Cole Richter <richter@ls3ip.com>
Sent: Thursday, March 3, 2022 8:40 PM
To: Nima Hefazi
Cc: QE-Sonos3; Anne-Raphaëlle Aubry; Sonos-NDCA06754-service
Subject: RE: Sonos III - Google's Fourth Set of RFPs and Correspondence

This message originated from outside your organization

Nima,

Based on your March 2 letter we understand that Google will not seek leave to amend its invalidity contentions to provide either (i) an explanation as to how it contends each cited portion of the charted references or systems meets the elements of the asserted claims, or (ii) provide identification of specific source code Google is relying on.

Unfortunately, your letter explanations regarding Exs. 885-6, 615-9, and 033-3 do not appropriately address the concerns raised in our letter. This is because these explanations are not part of Google's contentions and the court has not granted Google leave to supplement its contentions with material from a letter to counsel. Regardless, these explanations would still fail to cure the deficiencies noted in the letter because they do not address all the other claim elements, claims, and charted references that are similarly missing such narrative explanations (my letter clearly noted that the referenced limitations were exemplary only and that Google's contentions were rife with similar deficiencies), nor do they identify what specific source code Google is relying or intends to rely on.

Best,
Cole

From: Anne-Raphaëlle Aubry <anneraphaelleaubry@quinnemanuel.com>
Sent: Wednesday, March 2, 2022 7:05 PM
To: Cole Richter <richter@ls3ip.com>; Sonos-NDCA06754-service@orrick.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Sonos III - Google's Fourth Set of RFPs and Correspondence

Counsel,

Please see attached. Best,

Anne